

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA, :
: HON. GENE E.K. PRATTER
v. : CRIM. NO. 18-101
:
MEHDI NIKPARVAR-FARD :

ORDER

AND NOW, this _____ day of April, 2023, upon consideration of defendant's *Motion to Modify Conditions of Release*, it is hereby **ORDERED** that the said Motion is **GRANTED**. The defendant's conditions of release are modified to reflect that as of the date of this Order, the defendant, Mehdi Nikparvar-Fard, is permitted to be at 122 East 3rd Street, Pottstown, Pennsylvania between the hours of 8 a.m. and 5 p.m. seven days a week. It is further **ORDERED** that the costs of location monitoring be waived as of the date of this Order.

By the Court:

HON. GENE E.K. PRATTER
JUDGE, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA, :
: HON. GENE E.K. PRATTER
v. : CRIM. NO. 18-101
:
MEHDI NIKPARVAR-FARD :

MOTION TO MODIFY CONDITIONS OF RELEASE

The defendant, Mehdi Nikparvar-Fard, by his counsel, Caroline Goldner Cinquanto, Esquire, respectfully requests this Court grant his *Motion to Modify Conditions of Release* and in support thereof states the following:

1. On July 7, 2022, the Honorable Gene E.K. Pratter ordered that the defendant, Mehdi Nikparvar-Fard, be subject to location monitoring by a Global Positioning Device and not leave 400 Fairview Road, Penn Valley, Pennsylvania without the prior authorization of pretrial services or the Court [Doc. No. 433, ¶8].
2. The Nikparvar-Fard family owns a rental property located at 122 East 3rd Street in Pottstown, Pennsylvania. The property needs immediate repair. Mr. Nikparvar-Fard has received an estimate of \$130,000.00 to complete the work. [Exhibit 1] Mr. Nikparvar-Fard cannot afford to pay this cost.
3. Mr. Nikparvar-Fard is a licensed contractor [Exhibit 2]; therefore, he respectfully requests that he be allowed to go to the property located at 122 East 3rd Street to perform the work himself. Mr. Nikparvar-Fard has applied for the appropriate permit from the Borough of Pottstown Office of Licensing & Inspections. [Exhibit 3]

4. Neither AUSA Christopher Parisi nor Pretrial Officer Charles Meissler object to this modification of the defendant's conditions of release.

5. In addition to the above modification, Mr. Nikparvar-Fard respectfully requests that the costs of location monitoring be waived due to financial hardship. The costs of location monitoring are approximately \$4.20 a day. Pretrial Officer Charles Meissler does not object to this additional modification. AUSA Christopher Parisi does object to this additional modification.

In conclusion, it is respectfully requested that the Court modify the conditions of the defendant's release to reflect that Mr. Nikparvar-Fard is permitted to be at 122 East 3rd Street, Pottstown, Pennsylvania between the hours of 8 a.m. and 5 p.m. seven days a week and that the costs of location monitoring are waived.

Respectfully submitted,

/s/ Caroline Goldner Cinquanto
Caroline Goldner Cinquanto
Two Greenwood Square
3331 Street Road, Suite 450
Bensalem, PA 19020
O (215) 910-2732; F (215) 689-0812
Carrie@cgclegal.com

Counsel for Mehdi Nikparvar-Fard

Dated: April 13, 2023

CERTIFICATE OF SERVICE

I, Caroline Goldner Cinquanto, hereby certify that on this date I delivered by electronic means a true and correct copy of the foregoing Motion to the following counsel:

AUSA Christopher Parisi
United States Attorney's Office
615 Chestnut Street, Suite 1250
Philadelphia, PA 19106

//s// Caroline Goldner Cinquanto
Caroline Goldner Cinquanto
Two Greenwood Square
3331 Street Road, Suite 450
Bensalem, PA 19020
O (215) 910-2732; F (215) 689-0812
Carrie@cgclegal.com

Dated: April 13, 2023